

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

CALEB BARNETT, et al.,
Plaintiffs,

V.

KWAME RAOUL, et al.,
Defendants,

DANE HARREL, et al.,
Plaintiffs,

V.

KWAME RAOUL, et al.,
Defendants,

JEREMY W. LANGLEY, et al.,
Plaintiffs,

V.

BRENDAN KELLY, et al.,
Defendants,

**FEDERAL FIREARMS LICENSEES OF
ILLINOIS, et al.,
Plaintiffs,**

V.

**JAY ROBERT “J.B.” PRITZKER, et al.,
Defendants.**

) Case No. 3:23-cv-209-SPM
) **designated Lead Case

) Case No. 3:23-cv-141-SPM

) Case No. 3:23-cv-192-SPM

) Case No. 3:23-cv-215-SPM

DECLARATION OF TODD VANDERMYDE

1. I, Todd Vandermyde, am over the age of 18 and I make this declaration of my own knowledge, except as to any matters stated therein on information and belief, and as to such matters I believe them to be true. If called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am currently a resident of the State of Illinois and have been one continuously since before January 10, 2023.

3. I am currently a member of Gun Owners of America, Inc. (“GOA”), a plaintiff in the above-titled action, and have been one continuously since before January 10, 2023. I am also a supporter of Gun Owners Foundation (“GOF”).

4. I am not a police officer, retired police officer, prison warden, current member of the armed forces or national guard, nor do I work in armed security or private security contracting. I am thus not exempt from Protect Illinois Communities Act, House Bill 5471 (“PICA”)’s restrictions.

5. Prior to January 10, 2023, I lawfully owned and possessed within Illinois various firearms and parts that PICA restricts, which I used for various lawful purposes, including training, competition, and defense of myself, my family, my dogs (from coyotes), and my home. Those include at least one: (a) semiautomatic AR-platform rifle that accepts detachable magazines and has a pistol grip, flash suppressor, barrel shroud, and adjustable stock; (b) semiautomatic pistol that accepts detachable magazines and has the capacity to accept the magazine outside of the pistol grip, a flash suppressor, and a barrel shroud (i.e., an AR-style Pistol); (c) threaded barrel for a semiautomatic pistol; (d) semiautomatic rifle chambered in .22LR because it accepts a detachable magazine and has a thumbhole stock; (e) semiautomatic shotgun that has a pistol grip; (f) semiautomatic shotgun that has a thumbhole stock; and (g) semiautomatic shotgun that has an internal magazine with a capacity to accept more than 5 rounds.

6. I wish to lawfully acquire and possess within Illinois new firearms that PICA restricts, including, but not limited to a Browning 1919, a Barret M82, an Armalite AR180, several types of AK pattern firearms, SVD Dragonov, and an HK MP5 type firearm; and would acquire new parts that PICA restricts, including pistol grips, stocks, barrel shrouds, and AR or AK receivers, in order to build new or modify already-owned rifles.

7. PICA has injured me by precluding me from lawfully:

- a. maintaining possession within Illinois of the various firearms and parts that I lawfully own and possessed within Illinois just prior to January 10, 2023, without having timely submitted an endorsement affidavit for (i.e., registered) those firearms and parts, which I refused to submit, thus rendering me unable to lawfully possess and use them within Illinois;
- b. acquiring and possessing any of the firearms identified in Paragraph 5, above, which I have been wanting to acquire and use for lawful purposes, such as self-defense;
- c. using a threaded barrel that I own on my handgun that I use for self-defense in Illinois, which forced me to spend money to purchase a new non-threaded barrel for use in Illinois; and
- d. obtaining in Illinois certain replacement or alternative parts, described in Paragraph 6, above, to use on my currently owned firearms that PICA restricts or for the purpose of building new firearms;

8. But for fear of prosecution under PICA for doing so, I would engage in each of the activities described in the preceding paragraph. Specifically, I would lawfully:

- a. bring every firearm and part that I have removed from Illinois due to PICA back into Illinois to possess and use in Illinois for various lawful purposes, including self-defense, training, hunting, and target-shooting;
- b. acquire and possess each of the firearms identified in Paragraph 6, above;
- c. put a threaded barrel back on one of my pistols; and
- d. acquire and possess parts identified in Paragraph 6, above, for the purpose of replacing parts on my currently owned firearms or building new ones.

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on July 12, 2024, in Illinois.

s/ Todd Vandermyde
Todd Vandermyde
Declarant

CERTIFICATE OF SERVICE

I hereby certify that on July 12, 2024, an electronic PDF of **DECLARATION OF TODD VANDERMYDE** was sent by electronic mail to the following registered attorneys participating in the case:

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Dated: July 12, 2024

s/ Laura Palmerin
Laura Palmerin